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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW SATARIANO,

Defendant.

CASE NO. 1:21-CR-00295-JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: June 29, 2022
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on June 29, 2022.
2. By this stipulation, defendant now moves to continue the status conference until September 21, 2022, and to exclude time between June 29, 2022, and September 21, 2022.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes investigative reports, body camera video, photographs, and other evidence. The government also anticipates providing supplemental discovery consisting of laboratory reports, surveillance video, and other investigative reports in the next two weeks. All of this discovery will be produced directly to counsel and/or made available for inspection and copying.

b) Counsel for defendant desires additional time consult with his client, review discovery, investigate the charges, and discuss a potential plea offer with the government. Discussions are renewed in that new government counsel has entered her appearance recently.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of June 29, 2022 to September 21, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: June 24, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ KIMBERLY A. SANCHEZ
KIMBERLY A. SANCHEZ
Assistant United States Attorney

1 Dated: June 24, 2022

/s/ Steven Crawford

Steven Crawford

Counsel for Defendant

ANDREW SATARIANO

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5 **ORDER**

6 IT IS SO ORDERED.

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9 DATED: 06/27/2022

Sheila K. Oberto

10 THE HONORABLE SHEILA K. OBERO
11 UNITED STATES DISTRICT JUDGE
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